

AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.

Tyrone JOHNSON JR

Case No.

*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 30, 2024 in the county of Webb in the  
Southern District of Texas, the defendant(s) violated:

*Code Section*

8 USC 1324

*Offense Description*

Knowing and in reckless disregard of the fact that an alien had come to, entered, and remained in the United States in violation of law, did transport and move and attempted to transport and move and conspired to transport and move such alien within the United States by means of transportation and otherwise in furtherance of such violation of law.

This criminal complaint is based on these facts:

Continued on Affidavit

☒ Continued on the attached sheet./S/Michael Grant*Complainant's signature*Michael GrantBorder Patrol Agent*Printed name and title*

Sworn to before me and signed in my presence,

Date: February 01, 2024*Judge's signature*City and state: Laredo, TexasChristopher dos SantosU.S. Magistrate Judge*Printed name and title*

**AFFIDAVIT**

In support of Criminal Complaint

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

V.

Tyrone JOHNSON JR.

Case Number:

On January 30, 2024, at the United States (U.S.) Border Patrol Checkpoint, located at mile-marker 29 on Interstate 35 (I-35) north of Laredo, Texas in Webb County. At approximately 4:40 p.m., a 2024, white in color Freightliner approached the primary booth for inspection.

Primary Border Patrol Agent (BPA) encountered the driver, Tyrone JOHNSON Jr. BPA asked JOHNSON Jr if he was by himself, and JOHNSON Jr replied "Yes". BPA noticed that the curtains to the sleeper were closed and asked JOHNSON Jr if he would give consent to search inside the tractor. JOHNSON Jr replied "Yeah" and opened the door to allow the BPA into the tractor. The BPA then asked JOHNSON Jr to move to the passenger seat and if he could open the curtains to the sleeper portion of the tractor. JOHNSON Jr opened the curtains, and the BPA could see human silhouettes under the blankets. The BPA then asked JOHNSON Jr to "lift the blankets, sir", and JOHNSON Jr complied. The BPA was able to see a human hand of someone attempting to conceal himself. As the BPA attempted to detain JOHNSON Jr, he began to resist by saying "Why are you doing this to me. These are your people. God sent me!" A second BPA assisted the primary BPA to detain and remove JOHNSON Jr from the tractor. BPAs discovered a total of five subjects and removed them from the tractor. An immigration inspection was performed on the five subjects revealing they were all in the U.S. illegally with no right to be in the U.S. JOHNSON Jr and the undocumented noncitizens were placed under arrest and taken into the checkpoint for further investigation.

Tyrone JOHNSON Jr was read his Miranda Rights and acknowledged by signing Service Form I-214. JOHNSON Jr advised he was not willing to provide a statement without his lawyer present. All questions were ceased.

Juan Pablo AZUARA Munoz a citizen of Mexico, is serving as a material witness and freely stated he was illegally present in the U.S. AZUARA Munoz stated his friend back home made his arrangements to be smuggled into the U.S. AZUARA Munoz stated he was going to pay a total of \$9,500 United States Dollars (USD), to be taken to Houston, Texas. AZUARA Munoz stated he crossed on January 27, 2024, with three others and a guide. A white sedan picked them up and took them to a house where he stayed for a night and then taken to another house. On January 30, 2024, AZUARA Munoz stated he was picked up by an unknown man and was taken to a location where a white tractor trailer was parked. They were instructed to get into the tractor. AZUARA Munoz stated as he was getting into the tractor, JOHNSON Jr was sitting in the driver seat and used his cell phone for translation from the English language to Spanish to instruct them where to hide on the top sleeper. JOHNSON Jr covered them with a blanket and told them not to move. AZUARA Munoz stated JOHNSON JR began to drive the tractor trailer without making any stops before arriving at the checkpoint. Juan Pablo AZUARA Munoz was presented with six-person photo lineup and was able to positively identify Tyrone JOHNSON Jr as the driver.

SUBSCRIBED and SWORN to before me on

1st

day of

February, 2024

Signature of Judicial Officer

/S/ Grant, Michael Border Patrol Agent

Signature of Complainant